



May 24, 2023

Susan Poulsom and Brian Nickel
(Emailed to Nickel.Brian@epa.gov)
Water Division, NPDES Permitting Section
US EPA, Region 10
1200 Sixth Avenue, Suite 155
Seattle, Washington 98101

Subject: Public Notice Comments: NPDES Permit No. WA0050202
Washington Beef, LLC - Toppenish Plant

Dear Ms. Poulsom and Mr. Nickel:

I am submitting this public comment letter to share our concerns regarding the recently proposed discharge permit standards for the Washington Beef processing plant in Toppenish, WA. Unduly restrictive permit standards would have adverse effects in our region. We understand and appreciate EPA's role in addressing water discharges, and it is important to Second Harvest and especially our food bank clients that the permit standards are fair, reasonable, and done in the appropriate venue of the rulemaking process, not in a permit.

Washington Beef is a good environmental actor; in addition to its strong environmental record, Washington Beef has long supported Second Harvest and the families and communities we serve. Second Harvest is a nonprofit that supplies a network of partner food banks, meal sites and other programs feeding people in need in 21 counties in Eastern Washington and five counties in Northern Idaho.

For more than a decade, we have partnered with Washington Beef to provide quality protein to families in the Yakima and Toppenish areas, and across much of the state. This includes supporting families in need by distributing beef for holiday roasts. Moreover, Washington Beef employees volunteer their time to give out this high-quality protein to families in need. It would be a shame if this important work is jeopardized by EPA imposing new regulations that greatly exceed existing standards that have served the Toppenish community well.

The Environmental Protection Agency's proposed changes in water quality standards are a broad overreach of what is a reasonable standard. These changes in standards are being proposed outside of the existing federal rulemaking process and without an adequate process for Washington Beef to engage provide input.



Washington Beef is among the largest private sector employers in Yakima County, with many of their 1,500 hardworking people in the state being employed in Yakima County. The economic output from this business also supports indirect and induced employment in the region. The loss of Washington Beef as an employer would have great detrimental effects to the region and the people we serve.

I encourage you to reconsider the draft permit and instead, work with Washington Beef within the existing rulemaking process to share information and expertise through engagement with EPA's technical experts.

Thank you for considering our comments on Washington Beef's NPDES Permit, which are intended to be part of the Administrative Record.

Both our environment and our society rely on balance – Washington Beef is integral to both, by being stewards of the environment and providing protein needed in a balanced diet. It is important the good folks at Washington Beef can continue to do so.

Thank you.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Jason Clark', with a stylized flourish at the end.

Jason Clark

President & CEO

Second Harvest Inland Northwest

1234 E. Front Ave.

Spokane, WA 99202

Office: (509) 252-6262